

## COLORADO DEPARTMENT OF HEALTH CARE POLICY & FINANCING

1570 Grant Street, Denver, CO 80203-1818 ◆ (303) 866-2993 ◆ (303) 866-4411 Fax ◆ (303) 866-3883 TTY Bill Ritter, Jr., Governor ◆ Joan Henneberry, Executive Director

August 17, 2010

Ms. Carmen R. Nazario
Assistant Secretary
Administration for Children and Families
Department of Health and Human Services

Ms. Mary K. Wakefield, Ph.D., R.N. Administrator Health Resources and Services Administration Department of Health and Human Services

RE: FR Doc 2010-18013 Maternal, Infant and Early Childhood Home Visiting Programs

Dear Assistant Secretary Nazario and Dr. Wakefield:

I am writing to you on behalf of Colorado's single state Medicaid agency, the Department of Health Care Policy and Financing to provide comment on criteria for evidence of effectiveness of home visiting program models for pregnant women, expectant fathers, and caregivers of children birth through kindergarten entry.

Colorado strongly endorses the Department of Health and Human Services' (HHS) plan to competitively award a portion of funding available in future years based upon States' capacity and demonstrated commitment to improving child outcomes.

Colorado also endorses the plan to collect and publish information about implementation of those program models that have been prioritized. We suggest that the report describing the support available include state-based, model-specific technical assistance organizations that are authorized by the national office(s) to carry out model-specific support in particular States or regions in conjunction with the national office(s). We believe this will allow States to build on existing capacity, expertise, and long-standing relationships with national program offices, and to leverage existing public and private resources to support State efforts to achieve the benchmarks and outcomes intended.

Colorado suggests the HHS establish a streamlined appeals process, managed by an independent expert, to correct any errors in the evidence ratings of program models and to improve the criteria over time. Our rationale for this suggestion is that any review process, no matter how well designed may at times result in errors. Since the evidence ratings will have important funding consequences it is imperative that HHS develop an effective mechanism for study authors, program providers, and others to bring possible errors to HHS' attention so that the assertion of error can be independently assessed and, if verified, promptly corrected.

Colorado is excited about the opportunities presented by inclusion of maternal, infant and early childhood home visiting in the Affordable Care Act and looks forward to enhancing its existing program to improve outcomes for families. Thank you for the opportunity to provide comment on HHS' proposed approach for identifying prioritized models and making future funding awards. Should you have any questions, I can be reached at <a href="mailto:Barbara.prehmus@state.co.us">Barbara.prehmus@state.co.us</a> or via telephone at (303) 866-2991.

Sincerely,

Barbara B. Prehmus, M.P.H. Federal Policy & Rules Officer

Cc: Ms. Joan Henneberry, Executive Director

Ms. Lorez Meinhold, Director of Health Reform Implementation & Senior Health Policy Analyst, Colorado Governor Bill Ritter, Jr.

Ms. Jillian Jacobellis, Ph.D., M.S., Colorado Department of Public Health and Environment Ms. Ann C. Kohler, NASMD Director